

EXHIBIT C

From: Morgan Anastasio <morgananastasio@quinnemanuel.com>
Sent: Wednesday, July 30, 2025 5:06 PM
To: Enkeshafi, Parmida; Danielle Lazarus; Pohlman, Daniel J.
Cc: Kristin Tahler; Maaren Shah; Nicholas Inns; Breed, Maxwell
Subject: RE: Jones v. Abel, Case No. 1:25-cv-00779-LJL (SDNY) - Letter and Notices of Subpoena

Counsel:

Thank you for the call yesterday. To memorialize our conversation, you agreed to accept service of the subpoenas for the depositions of Ms. Case and Ms. Koslow served on July 21. We are open to coordinating a single deposition date for each of your clients in this and the Lively matter. Please advise of your clients' availability.

Regarding the document subpoenas, we agreed in writing on July 23 to narrow our original requests. You confirmed during our conferral yesterday that your position is that you view your production as complete in the Lively action and here. While you are amenable to providing us the documents produced in the Lively action as well as the search terms you used, you are not amenable to producing additional documents responsive to our subpoenas, even though those subpoenas seek documents and communications that would not have been produced in and were not relevant to the Lively action.

Given that position, we consider the parties at an impasse and will be moving to compel compliance with the subpoenas, as narrowed.

Best,
Morgan

From: Morgan Anastasio
Sent: Monday, July 28, 2025 5:43 PM
To: Enkeshafi, Parmida <PEnkeshafi@pryorcashman.com>; Danielle Lazarus <daniellelazarus@quinnemanuel.com>; Pohlman, Daniel J. <dpohlman@pryorcashman.com>
Cc: Kristin Tahler <kristintahler@quinnemanuel.com>; Maaren Shah <maarensah@quinnemanuel.com>; Nicholas Inns <nicholasinns@quinnemanuel.com>; Breed, Maxwell <MBreed@pryorcashman.com>
Subject: RE: Jones v. Abel, Case No. 1:25-cv-00779-LJL (SDNY) - Letter and Notices of Subpoena

Thanks, Parmida. I will send a zoom for that time.

From: Enkeshafi, Parmida <PEnkeshafi@pryorcashman.com>
Sent: Monday, July 28, 2025 5:02 PM
To: Morgan Anastasio <morgananastasio@quinnemanuel.com>; Danielle Lazarus <daniellelazarus@quinnemanuel.com>; Pohlman, Daniel J. <dpohlman@pryorcashman.com>
Cc: Kristin Tahler <kristintahler@quinnemanuel.com>; Maaren Shah <maarensah@quinnemanuel.com>; Nicholas Inns <nicholasinns@quinnemanuel.com>; Breed, Maxwell <MBreed@pryorcashman.com>
Subject: RE: Jones v. Abel, Case No. 1:25-cv-00779-LJL (SDNY) - Letter and Notices of Subpoena

[EXTERNAL EMAIL from penkeshafi@pryorcashman.com]

Morgan,

We are available at 4:30 p.m. tomorrow.

Parmida

Parmida Enkeshafi

PRYOR CASHMAN LLP

7 Times Square, New York, NY 10036-6569

+1-212-326-0882 (Direct) | penkeshafi@pryorcashman.com

From: Morgan Anastasio <morgananastasio@quinnemanuel.com>

Sent: Monday, July 28, 2025 3:59 PM

To: Danielle Lazarus <daniellelazarus@quinnemanuel.com>; Pohlman, Daniel J. <dpohlman@pryorcashman.com>

Cc: Kristin Tahler <kristintahler@quinnemanuel.com>; Maaren Shah <maarenschah@quinnemanuel.com>; Nicholas Inns <nicholasinns@quinnemanuel.com>; Breed, Maxwell <MBreed@pryorcashman.com>; Enkeshafi, Parmida <PEnkeshafi@pryorcashman.com>

Subject: RE: Jones v. Abel, Case No. 1:25-cv-00779-LJL (SDNY) - Letter and Notices of Subpoena

Counsel,

Following up on the below. Please let us know when you are available tomorrow to meet and confer.

Thank you,
Morgan

From: Danielle Lazarus <daniellelazarus@quinnemanuel.com>

Sent: Friday, July 25, 2025 3:31 PM

To: Pohlman, Daniel J. <dpohlman@pryorcashman.com>; Morgan Anastasio <morgananastasio@quinnemanuel.com>

Cc: Kristin Tahler <kristintahler@quinnemanuel.com>; Maaren Shah <maarenschah@quinnemanuel.com>; Nicholas Inns <nicholasinns@quinnemanuel.com>; Breed, Maxwell <MBreed@pryorcashman.com>; Enkeshafi, Parmida <PEnkeshafi@pryorcashman.com>

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Thank you. We are available from 11:00 am to 5:00 pm ET on Tuesday, except from 3-3:30 pm.

Danielle Lazarus

Associate

Quinn Emanuel Urquhart & Sullivan, LLP

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New York, NY 10016

212-849-7464 Direct

212-849-7000 Main Office Number

212-849-7100 Fax

daniellelazarus@quinnemanuel.com

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From: Pohlman, Daniel J. <dpohlman@pryorcashman.com>

Sent: Friday, July 25, 2025 2:12 PM

To: Danielle Lazarus <daniellelazarus@quinnemanuel.com>; Morgan Anastasio <morgananastasio@quinnemanuel.com>

Cc: Kristin Tahler <kristintahler@quinnemanuel.com>; Maaren Shah <maarenschah@quinnemanuel.com>; Nicholas Inns <nicholasinns@quinnemanuel.com>; Breed, Maxwell <MBreed@pryorcashman.com>; Enkeshafi, Parmida <PEnkeshafi@pryorcashman.com>

Subject: RE: Jones v. Abel, Case No. 1:25-cv-00779-LJL (SDNY) - Letter and Notices of Subpoena

[EXTERNAL EMAIL from dpohlman@pryorcashman.com]

Counsel,

We are not available to confer on Monday, but can confer with you on Tuesday. Please let us know when you are available.

That said, your letter dated July 23, 2025 is largely unresponsive to our letter dated July 22, 2025. At the meet and confer please be prepared to discuss the issues raised in our letter in a direct and forthright manner.

Our clients reserve all rights and waive none.

—
Daniel J. Pohlman / PRYOR CASHMAN LLP / 212.326.0823

From: Danielle Lazarus <daniellelazarus@quinnemanuel.com>

Sent: Friday, July 25, 2025 1:50 PM

To: Morgan Anastasio <morgananastasio@quinnemanuel.com>; Pohlman, Daniel J. <dpohlman@pryorcashman.com>

Cc: Kristin Tahler <kristintahler@quinnemanuel.com>; Maaren Shah <maarenschah@quinnemanuel.com>; Nicholas Inns <nicholasinns@quinnemanuel.com>; Breed, Maxwell <MBreed@pryorcashman.com>; Enkeshafi, Parmida <PEnkeshafi@pryorcashman.com>

Subject: RE: Jones v. Abel, Case No. 1:25-cv-00779-LJL (SDNY) - Letter and Notices of Subpoena

Counsel,

We still have not received a response from you on our narrowed document requests. Please provide your availability for a meet and confer on Monday on this issue, as well as deposition dates for your clients. We are open to discussing your clients sitting only once for a combined deposition, but we cannot agree to a date (including the August 4/5 dates) until and unless we receive your document production. In that vein, if we receive documents from your clients by July 31, we would be open to proceeding with their depositions on August 4 or 5; if we do not, we will need to schedule their depositions for a later date (resulting in them each being deposed at least twice).

Please provide your availability by the end of the day today.

Best,
Danielle

Danielle Lazarus

Associate

Quinn Emanuel Urquhart & Sullivan, LLP

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212-849-7000 Main Office Number

212-849-7100 Fax

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From: Morgan Anastasio <morgananastasio@quinnemanuel.com>

Sent: Wednesday, July 23, 2025 1:46 PM

To: Pohlman, Daniel J. <dpohlman@pryorcashman.com>

Cc: Kristin Tahler <kristintahler@quinnemanuel.com>; Maaren Shah <maarenschah@quinnemanuel.com>; Nicholas Inns <nicholasinns@quinnemanuel.com>; Danielle Lazarus <daniellelazarus@quinnemanuel.com>; Breed, Maxwell <MBreed@pryorcashman.com>; Enkeshafi, Parmida <PEnkeshafi@pryorcashman.com>

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Counsel,

Please see attached. Please also let us know when you are available tomorrow for a meet and confer to discuss the document and deposition subpoenas.

Thank you,
Morgan

From: Pohlman, Daniel J. <dpohlman@pryorcashman.com>

Sent: Tuesday, July 22, 2025 1:47 PM

To: Morgan Anastasio <morgananastasio@quinnemanuel.com>

Cc: Kristin Tahler <kristintahler@quinnemanuel.com>; Maaren Shah <maarenschah@quinnemanuel.com>; Nicholas Inns <nicholasinns@quinnemanuel.com>; Danielle Lazarus <daniellelazarus@quinnemanuel.com>; Breed, Maxwell <MBreed@pryorcashman.com>; Enkeshafi, Parmida <PEnkeshafi@pryorcashman.com>

Subject: RE: Jones v. Abel, Case No. 1:25-cv-00779-LJL (SDNY) - Letter and Notices of Subpoena

[EXTERNAL EMAIL from dpohlman@pryorcashman.com]

Counsel,

Please see the attached letter.

—
Daniel J. Pohlman / PRYOR CASHMAN LLP / 212.326.0823

From: Morgan Anastasio <morgananastasio@quinnemanuel.com>

Sent: Monday, July 21, 2025 10:36 AM

To: Pohlman, Daniel J. <dpohlman@pryorcashman.com>

Cc: Kristin Tahler <kristintahler@quinnemanuel.com>; Maaren Shah <maarenschah@quinnemanuel.com>; Nicholas Inns <nicholasinns@quinnemanuel.com>; Danielle Lazarus <daniellelazarus@quinnemanuel.com>

Subject: Jones v. Abel, Case No. 1:25-cv-00779-LJL (SDNY) - Letter and Notices of Subpoena

Counsel,

Please see the attached correspondence and notices of subpoena. Please confirm you will accept service on behalf of Ms. Case and Ms. Koslow.

Best regards,
Morgan

Morgan L. Anastasio
Associate (she/her)
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